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April 7, 2025

**VIA ECF**

Hon. Alvin K. Hellerstein  
 United States District Judge  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

The motion for preliminary injunction injunction is  
 will be heard April 24, 2025, at 10:00 a.m.  
 The court hearing date is April 9, 2025.  
 The court hearing date is April 9, 2025.  
 against. Since the motion for preliminary injunction  
 Feb. 6, 2025, & cannot be all def.  
 except to accepted by all def.  
 4/7/25  
 AKH

**Re: Denim Tears, LLC v. Shenzhen Xiaotangren Technology Co., Ltd., et al.**  
**Case No. 24-cv-5675 (AKH)**  
**Second Letter Request to Adjourn Preliminary Injunction Hearing**

Dear Judge Hellerstein,

We represent Plaintiff Denim Tears, LLC (“Plaintiff”) in the above-referenced action (the “Action”). By Order dated April 1, 2025, the Court granted the parties’ request to adjourn the preliminary injunction hearing to April 9, 2025 at 11:00 a.m. Unfortunately, Plaintiff’s counsel has a conflict on April 9, 2025 and respectfully requests to adjourn the preliminary injunction hearing.

In accordance with Your Honor’s Individual Rules, Plaintiff submits the following:

- i. **The Original Date:** April 9, 2025 at 11:00 a.m.;
- ii. **The Number of Previous Requests for Adjournment:** The parties requested to adjourn the continued preliminary injunction hearing twice to engage in settlement discussions, but this is the second request to adjourn the preliminary injunction hearing after the supplemental briefing has been filed;
- iii. **Whether Previous Requests Were Denied/Granted:** The Court granted the parties’ previous requests;
- iv. **Whether Adversary Consents:** Plaintiff’s counsel conferred with counsel for Defendants who consents to Plaintiff’s request;
- v. **All Other Dates Previously Scheduled:** None;
- vi. **Proposed Alternate Dates:** After conferring with counsel for Defendants and contacting Your Honor’s Chambers for the Court’s availability, the parties are available to appear for a preliminary injunction hearing on April 23, 2025 or April 24, 2025.

Plaintiff further respectfully requests that the relief granted in the temporary restraining order be extended through the date of the rescheduled hearing on Plaintiff’s Application for a preliminary injunction order.

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April 7, 2025  
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We thank the Court for its time and consideration.

Respectfully submitted,  
**EPSTEIN DRANGEL LLP**

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